

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-***
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

**DEFENDANTS' REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS
DIRECTED TO PLAINTIFFS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants, through their undersigned counsel, hereby serve on each Plaintiff the following Requests for Production of Documents and Things.

INSTRUCTIONS

A. If any document or thing required to answer any Request for Production is withheld because you claim that such information is privileged or is contained in a privileged document or communication:

- (1) identify each such document with sufficient specificity to permit a court to determine the propriety of the asserted privilege and setting forth the nature of the document;
- (2) identify the privilege and set forth the factual basis for the privilege claims; and
- (3) set forth each Request to which each such document or thing is responsive.

B. These Requests for Production are directed to each individual Plaintiff, are continuing in nature and, if applicable, will require supplemental responses pursuant to Rule

26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

1. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in the Amended Complaint, including, but not limited to, all grievances or complaints submitted by each Plaintiff to Department of Correction personnel, responses thereto, and any related correspondence between each Plaintiff and Department of Correction personnel.

REQUEST NO. 2:

2. All correspondence relating to, regarding or arising out of the incidents alleged in the Amended Complaint, including, but not limited to, any correspondence between friends or family members of each Plaintiff or other inmates and Department of Correction personnel.

REQUEST NO. 3:

3. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in the Amended Complaint and any statements, declarations, or affidavits of each Plaintiff, other inmates, or witnesses to the allegations in the Amended Complaint.

REQUEST NO. 4:

4. Any tests, reports, studies or any other documents relating to, regarding or arising out of the incidents alleged in the Amended Complaint.

REQUEST NO. 5:

5. All criminal history records for each Plaintiff from any other state besides Delaware for the past 15 years.

REQUEST NO. 6:

6. All medical records for each Plaintiff relating to, regarding or arising out of the incidents alleged in the Amended Complaint.

REQUEST NO. 7:

7. All medical records for each Plaintiff for the past 15 years.

REQUEST NO. 8:

8. Any and all document(s) referenced or identified in Plaintiff's Responses to Interrogatories served contemporaneously herewith.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

/s/ Eileen Kelly
Eileen Kelly (I.D. 2884)
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Attorney for Defendants

Dated: March 8, 2007

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2007, I electronically filed *Defendants' Request for Production of Documents and Things Directed to Plaintiffs* with the Clerk of Court using CM/ECF. I hereby certify that on March 8, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached service list.

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